



Pennsylvania Department of Environmental Protection

909 Elmerton Avenue  
Harrisburg, PA 17110-8200  
September 19, 2007

Southcentral Regional Office

717-705-4707  
FAX - 717-705-4760

SEP 25 2007

Jeff Hamon  
P. H. Glatfelter Company  
228 South Main Street  
Spring Grove, PA 17362-0500

Re: Industrial Waste and Storm Water  
P. H. Glatfelter Company  
NPDES Permit No. PA 0008869  
Minor Amendment  
APS ID No. 8869  
Spring Grove Borough, North Codorus  
Township and Jackson Township,  
York County

Dear Mr. Hamon:

The Department has received your letter dated August 29, 2007 that requests changes to instream color monitoring requirements and addresses permit conditions requiring the development of plans concerning minimization of instream hourly temperature changes and the No. 2 Supernatant Pump Station. The Department responds to each of these issues below.

Instream Color Monitoring

As requested, the Department has modified the permit to eliminate the demonstration study that was to occur to document similarity of 8-hour composite samples with 24-hour composite samples due to Glatfelter's willingness to conduct 24-hour composite sampling for instream color.

Instream Hourly Temperature Changes

The Department acknowledges the potential sources of instream hourly temperature changes identified by Glatfelter and the methods employed to control such changes. The Department also acknowledges that natural or emergency conditions may result in unexpected changes exceeding the regulatory criterion of 2°F per hour.

Glatfelter requests that the instantaneous maximum hourly temperature change limitation be modified from 2.0°F per hour to 2°F per hour to be consistent with the regulatory criterion and due to limitations on the accuracy of temperature sensors. The Department agrees and has revised the permit accordingly. Glatfelter also requests that the limitation only apply to positive values, i.e., where the change in downstream temperature is greater than 2°F as compared to the change in upstream temperature. The Department acknowledges that negative hourly temperature change values generally occur only in situations where there are decreases in production and little retention time to attenuate



temperature decreases, such as a power generation facility decreasing load at night. However, the water quality standard is based on temperature change, which may be in the positive or negative direction. In the event that Glatfelter calculates negative values for hourly temperature change that exceed the limitation, the Department suggests that Glatfelter review the possible cause(s) and submit its findings as an attachment to the DMR, which the Department will take into consideration.

#### No. 2 Supernatant Pump Station

The Department has cited numerous concerns regarding this pump station. Glatfelter proposes to eliminate the pump station through regrading activities to allow for the discharge of storm water from Lagoons 11 and 12 to Codorus Creek. No schedule is proposed by Glatfelter. The Department requests that Glatfelter respond with a schedule by which the pump station will be decommissioned as measured from approval of the closure plan by the Waste Management Program. This project should be given the highest priority for closure activities. Prior to construction, Glatfelter must identify the new storm water discharge point(s) on a plan and receive an amendment to the permit to allow for a new discharge of storm water to Codorus Creek. The Department suggests that Glatfelter submit the plan as soon as possible to avoid delays in implementation.

Enclosed are the pages of the permit that have been modified and the DMR for Outfall 001. No other changes have been made to the permit.

If you have any questions, please contact me at (717) 705-4795.

Sincerely,



Lee A. McDonnell, P.E.  
Program Manager  
Water Management Program

cc: **US EPA Region III**



**PART A - EFFLUENT LIMITATIONS, MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS**

I. For Outfall 001, Latitude 39°52'42", Longitude 76°50'51", Stream Code 08032,

River Mile Index 24.45, which receives industrial process wastewater from production of pulp and paper, storm water, and municipal sewage treatment plant effluent.

- a. Based on the anticipated cooling water characteristics and flows, the following effluent and instream limitations and monitoring requirements apply (see also Additional Requirements, Footnotes, and Supplemental Information).

Parameter	DISCHARGE LIMITATIONS							MONITORING REQUIREMENTS	
	Mass Loading <sup>(1)</sup>				Concentrations			Minimum <sup>(4)</sup> Measurement Frequency	Required Sample Type
	Average Monthly (lbs/day)	Maximum Daily (lbs/day)	Total <sup>(2)</sup> Monthly (lbs)	Total <sup>(3)</sup> Annual (lbs/year)	Average Monthly (mg/l)	Maximum Daily (mg/l)	Instant. Maximum (mg/l)		
Flow (MGD)	Monitor & Report	Monitor & Report	XXX	XXX	XXX	XXX	XXX	Continuous	Measured
pH (S.U.)	XXX	XXX	XXX	XXX	6.0 to 9.0 S.U. at all times			Continuous	Recorded
D.O.	XXX	XXX	XXX	XXX	Minimum of 5.0 mg/l at all times			1/day	Grab
Total Suspended Solids	2,057	4,113	XXX	XXX	30	60	75	1/day	24-hour comp
BOD <sub>5</sub> (5/1 to 10/31)	1,168	2,335	XXX	XXX	14	25	25	1/day	24-hour comp
BOD <sub>5</sub> (11/1 to 4/30)	1,751	3,503	XXX	XXX	17	34	38	1/day	24-hour comp
NH <sub>3</sub> -N (5/1 to 10/31)	XXX	XXX	Monitor & Report	XXX	1.5	3.0	3.8	1/day	24-hour comp
NH <sub>3</sub> -N (11/1 to 4/30)	XXX	XXX	Monitor & Report	XXX	2.0	4.0	5.0	1/day	24-hour comp
Color (PCU) <sup>(5)</sup> (Upstream)	XXX	XXX	XXX	XXX	Monitor & Report	Monitor & Report	XXX	1/day	24-hour comp
Color (PCU) (Influent)	XXX	XXX	XXX	XXX	Monitor & Report	Monitor & Report	XXX	1/day	24-hour comp
Color (PCU) (Effluent) (5/1 to 10/31)	XXX	XXX	XXX	XXX	140	280	350	1/day	24-hour comp
Color (PCU) (Effluent) (11/1 to 4/30)	XXX	XXX	XXX	XXX	123	246	307	1/day	24-hour comp
Color (PCU) <sup>(5)</sup> (Downstream)	XXX	XXX	XXX	XXX	Monitor & Report	Monitor & Report	XXX	1/day	24-hour comp
Absorbable Organic Halides (AOX) <sup>(3)</sup>	XXX	812	XXX	364	Monitor & Report	Monitor & Report	XXX	1/month	24-hour comp
Temperature (°F) (Effluent)	XXX	XXX	XXX	XXX	XXX	Monitor & Report	110	1/day	"i-s"
Temperature (°F) <sup>(6)</sup> (Upstream)	XXX	XXX	XXX	XXX	Monitor & Report	Monitor & Report	XXX	Continuous	"i-s"
Temperature (°F) <sup>(6), (7)</sup> (Downstream) (Interim)	XXX	XXX	XXX	XXX	Footnote 7	XXX	XXX	1/day	"i-s"
Temperature (°F) <sup>(6), (8)</sup> (Downstream) (Final)	XXX	XXX	XXX	XXX	Footnote 8	Footnote 8	XXX	Continuous	"i-s"
Hourly Instream Temperature Change <sup>(9)</sup>	XXX	XXX	XXX	XXX	XXX	Monitor & Report	2	Continuous	"i-s"

The permittee shall conduct effluent cooling operations continuously, unless bypassing of the cooling system is done in accordance with Part B I.F of this permit or as otherwise authorized by an O&M Plan approved by the Department. No exceptions to meeting Final temperature limitations will be authorized unless the cooling system is operated at design capacity. Exceptions may be considered for situations where facilities or equipment are inoperable due to reasons beyond the permittee's control.

9. Calculate the instantaneous maximum hourly instream temperature change by subtracting the instantaneous hourly upstream temperature change from the instantaneous hourly downstream temperature change (averaged across all temperature monitors) (i.e., net instream temperature change). See the DMR Instructions for an example calculation and reporting procedures in the event that data are not available for one or more monitors. Report the maximum daily net instream temperature change that occurs over a one-hour period on the Supplemental DMR, and the instantaneous maximum net instream hourly temperature change measured during the month on the DMR.

Within 90 days of permit issuance, the permittee shall submit a written plan that identifies how instream hourly temperature changes will be minimized during facility startup, shutdown and other conditions that could lead to instream temperature changes that exceed the limitation. The permittee shall respond to comments on the plan within 15 days. The permittee shall implement the plan immediately upon receipt of written Department approval or within 30 days of plan submission, if no comments are received. The Department will not consider instream hourly temperature changes that exceed the limitation a violation of the permit if the exceedance(s) result from conditions identified in the plan and the permittee has implemented the plan.

10. The monitoring and reporting requirements for Total Nitrogen (Total N) and Total Phosphorus (Total P) contained in Part A.I of this permit are for the purpose of establishing existing discharge loads. This permit may be modified pursuant to 40 CFR 122.62 to establish final annual discharge limitations for Total N and Total P, to replace the monitoring and reporting for these parameters in Part A. If final discharge limitations are implemented through a watershed permit, the monitoring and reporting for Total N and Total P established in Part A of this permit shall be superceded by any annual discharge effluent limitations in the watershed permit.
11. The Total Nitrogen (expressed as N) content of an aqueous sample is determined by adding the individual analytical results (expressed as N) for Total Kjeldahl Nitrogen, Nitrite-Nitrogen, and Nitrate-Nitrogen. Total Kjeldahl Nitrogen is the sum of Organic Nitrogen and Ammonia Nitrogen as determined by the Kjeldahl method.
12. The permittee shall report the minimum daily average stream flow and the minimum 7-day continuous average stream flow on DMRs, as measured at USGS Gaging Station No. 01574500, prior to the addition of Outfall 001 flows to the published data.

#### Supplemental Information:

1. The effluent limitations for Outfalls 001 and 002 were determined using effluent discharge rates of 13.7 MGD and 15.1 MGD, respectively.
2. The test methods listed in 40 CFR Part 136, Table 1B shall be used for the following parameters:

<u>Parameters</u>	<u>Table 1B Parameter No.</u>
Total Kjeldahl Nitrogen	31
Nitrate-Nitrite as N	39
Phosphorus	50
Ammonia Nitrogen	4

Nitrate-Nitrite as N may be analyzed using EPA Test Method 300.0.



**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT**

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**NAME:** P. H. Glatfelter Company  
**ADDRESS:** 228 South Main Street  
 Spring Grove, PA 17362-0500  
**LOCATION:** Spring Grove Borough, North Codorus Township and  
 Jackson Township, York County  
**WATERSHED:** 7-H

<b>PA 0008869</b>					<b>OUTFALL 001</b>		
<b>MONITORING PERIOD</b>							
<b>FROM</b>	<b>YEAR</b>	<b>MO</b>	<b>DAY</b>	<b>TO</b>	<b>YEAR</b>	<b>MO</b>	<b>DAY</b>

This permit EXPIRES: **May 31, 2012**

Permit renewal application DUE DATE: **December 1, 2011**

**NOTE: READ INSTRUCTIONS BEFORE COMPLETING THIS FORM**

PARAMETER	QUANTITY OR LOADING				UNITS	QUALITY OR CONCENTRATION				NO EX	ANALYSIS FREQ	SAMPLE TYPE
	AVG	MAX	ANN			MIN	AVG	MAX				
FLOW	SAMPLE MEASUREMENT			XXX	MGD	XXX	XXX	XXX				
	PERMIT REQUIREMENT	Report Avg Mo	Report Max Daily	XXX		XXX	XXX	XXX	XXX	X	Continuous	Meas
pH	SAMPLE MEASUREMENT	XXX	XXX	XXX	XXX		XXX					
	PERMIT REQUIREMENT	XXX	XXX	XXX		6.0 Minimum	XXX	9.0 Maximum	S.U.	X	Continuous	Meas
DISSOLVED OXYGEN	SAMPLE MEASUREMENT	XXX	XXX	XXX	XXX	XXX	XXX	XXX				
	PERMIT REQUIREMENT	XXX	XXX	XXX		5.0 Minimum	XXX	XXX	mg/l	X	1/day	Grab
TOTAL SUSPENDED SOLIDS	SAMPLE MEASUREMENT			XXX	lbs/day	XXX						
	PERMIT REQUIREMENT	2,057 Avg Mo	4,113 Max Daily	XXX		XXX	30 Avg Mo	60 Max Daily	mg/l	X	1/day	24-hr comp
BOD <sub>5</sub> (5/1 to 10/31)	SAMPLE MEASUREMENT			XXX	lbs/day	XXX						
	PERMIT REQUIREMENT	1,168 Avg Mo	2,335 Max Daily	XXX		XXX	14 Avg Mo	25 Max Daily	mg/l	X	1/day	24-hr comp
BOD <sub>5</sub> (11/1 to 4/30)	SAMPLE MEASUREMENT			XXX	lbs/day	XXX						
	PERMIT REQUIREMENT	1,751 Avg Mo	3,503 Max Daily	XXX		XXX	17 Avg Mo	34 Max Daily	mg/l	X	1/day	24-hr comp
NH <sub>3</sub> -N (5/1 to 10/31)	SAMPLE MEASUREMENT		XXX	XXX	lbs	XXX						
	PERMIT REQUIREMENT	Report Total Mo	XXX	XXX		XXX	1.5 Avg Mo	3.0 Max Daily	mg/l	X	1/day	24-hr comp
NH <sub>3</sub> -N (11/1 to 4/30)	SAMPLE MEASUREMENT		XXX	XXX	lbs	XXX						
	PERMIT REQUIREMENT	Report Total Mo	XXX	XXX		XXX	2.0 Avg Mo	4.0 Max Daily	mg/l	X	1/day	24-hr comp
COLOR (UPSTREAM)	SAMPLE MEASUREMENT	XXX	XXX	XXX	XXX	XXX						
	PERMIT REQUIREMENT	XXX	XXX	XXX		XXX	Report Avg Mo	Report Max Daily	PCU	X	1/day	24-hr comp
COLOR (INFLUENT)	SAMPLE MEASUREMENT	XXX	XXX	XXX	XXX	XXX						
	PERMIT REQUIREMENT	XXX	XXX	XXX		XXX	Report Avg Mo	Report Max Daily	PCU	X	1/day	24-hr comp
COLOR (EFFLUENT) (5/1 to 10/31)	SAMPLE MEASUREMENT	XXX	XXX	XXX	XXX	XXX						
	PERMIT REQUIREMENT	XXX	XXX	XXX		XXX	140 Avg Mo	280 Max Daily	PCU	X	1/day	24-hr comp
COLOR (EFFLUENT) (11/1 to 4/30)	SAMPLE MEASUREMENT	XXX	XXX	XXX	XXX	XXX						
	PERMIT REQUIREMENT	XXX	XXX	XXX		XXX	123 Avg Mo	246 Max Daily	PCU	X	1/day	24-hr comp
COLOR (DOWN- STREAM)	SAMPLE MEASUREMENT	XXX	XXX	XXX	XXX	XXX						
	PERMIT REQUIREMENT	XXX	XXX	XXX		XXX	Report Avg Mo	Report Max Daily	PCU	X	1/day	24-hr comp
ABSORBABLE ORGANIC HALIDES	SAMPLE MEASUREMENT	XXX			lbs/day	XXX						
	PERMIT REQUIREMENT	XXX	812 Max Daily	364 Ann		XXX	Report Avg Mo	Report Max Daily	mg/l	X	1/month	24-hr comp

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